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COURTNEY M. PRICE

VICE PRESIDENT

January 12, 2004



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The Honorable Michael O. Leavitt Administrator U.S. Environmental Protection Agency P. O. Box 1473

ACC CHEMSTAR

RE: Olefins Panel Robust Summaries for Testing and Modeling Conducted Under the HPV Challenge Program: High Benzene Naphthas Category HPV Registration No.

Dear Administrator Leavitt:

Merrifield, VA 22116

On December 12, 2001, the American Chemistry Council Olefins Panel (Panel) submitted a Test Plan under the High Production Volume (HPV) Chemical Challenge Program pertaining to the High Benzene Naphthas Category. On August 7, 2003, the Panel submitted a revised test plan for this category. In the test plans, the Panel proposed to use predictive computer models to develop relevant physical chemical properties, and environmental fate data.

With this letter, the Panel submits robust summaries for modeling and calculations outlined in the test plan for the High Benzene Naphthas Category, as follows:

- Calculated Boiling Point Range
- Calculated Hydrolysis (Stability in Water)
- Calculated Melting Point Range
- Calculated Partition Coefficient
- Calculated Photodegradation (Direct)
- Calculated Photodegradation (indirect)
- Calculated Transport/Distribution (Fugacity)
- Calculated Vapor Pressure Range
- Calculated Water Solubility Range

The Panel plans to submit a report on the category in 2004.

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If you have any questions, please contact Dr. Elizabeth Moran, Manager of the Olefins Panel at 301 924 2006 or <u>Elizabeth Moran@americanchemistry.com</u>.

Sincerely yours,

Courtney M. Price Vice President, CHEMSTAR

Attachments cc: R. Hefter (EPA)